

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

801 K STREET, MS 19-01, SACRAMENTO, CALIFORNIA 95814 • (916) 322-4027 • WWW.CALRECYCLE.CA.GOV

March 24, 2011

Mr. James A. Wyse, President
Pacific Waste Services, Inc.
12925 Alcosta Blvd., Suite 1
San Ramon, CA 94583

SUBJECT: Final Report for Ground and Screened Construction and Demolition Debris as
Alternative Daily Cover at the City of Paso Robles Landfill
Facility No. 40-AA-0001

Dear Mr. Wyse:

Department of Resources Recycling and Recovery (CalRecycle) staff have reviewed your "ADC Demonstration Project, C&D Fines, Paso Robles Landfill" letter, dated February 2, 2011. The submittal serves as the final report documenting the use of ground and screened construction and demolition debris (C&D fines) as Alternative Daily Cover (ADC) at the subject facility, as requested in CalRecycle's September 10, 2009 demonstration project approval letter. The demonstration project was conducted from September 2009 to October 2010. The final report concludes that the C&D fines, as described in the August 14, 2009 demonstration project, were shown to be suitable for use as an ADC.

Based on the information provided in the final report and no concerns noted during CalRecycle's monthly inspections on the performance of the C&D fines to control vectors, fires, odors, blowing litter or scavenging during the demonstration project, CalRecycle staff concurs with your determination that the C&D fines can meet the functional criteria of earthen cover material when used as described in the approved demonstration project. The monitoring data sheets included with the final report demonstrated that a cover thickness of six (6) inches was adequate to meet the monitoring criteria to control vectors, fires, odors, blowing litter, and scavenging. Therefore, the depth of the C&D fines as ADC shall be limited to six (6) inches.

Since the C&D fines were not available for use on a consistent basis during the demonstration project, the final report notes that you will take some additional time, 90 days, to determine the quantities of the C&D fines and extent of existing and additional customer interest prior to submitting an application for RFI Amendment for the ongoing use of the C&D fines as an ADC. The C&D fines will not be used as an ADC until a RFI Amendment is submitted and approved. CalRecycle staff also understands that the C&D fines have not been used since August 2010, however, sufficient data was collected to demonstrate that the C&D fines functioned as a suitable cover material to control vectors, fires, odors, blowing litter, and scavenging.


If an Application for RFI Amendment is submitted, the application package shall also include updates to the RFI (Report of Disposal Site Information, dated August 2007) to reflect the



ongoing use of C&D fines as an ADC, including all the operational parameters as described in the approved demonstration project (e.g., handling, six inches thick, not exposed greater than 24 hours, screened with maximum two inch screen, only use when less than 40% chance of rain in eight hours, parameters for rejecting loads, etc.). It is recommended that you consult with the Central Coast Regional Water Quality Control Board regarding their approval/conditions for the ongoing use of C&D fines as ADC and include any such approvals and/or conditions with the RFI Amendment. In the event you decide not to submit an application for RFI Amendment for the ongoing use of C&D fines as ADC, please notify CalRecycle in writing of this determination.

An Application for Solid Waste Facility Permit form is enclosed for your use and is also available online at <http://www.calrecycle.ca.gov/LEA/Forms/#Permit>.

For questions regarding the RFI Amendment process or other permitting questions, please contact Christine Karl at (916) 341-6405 or christine.karl@calrecycle.ca.gov. If you have any questions regarding this correspondence, please contact Randy Friedlander at (916) 341-6718 or randy.friedlander@calrecycle.ca.gov.

Sincerely,


Ted Rauh, Deputy Director
Compliance and Enforcement Division
Department of Resources Recycling and Recovery

* Please note that correspondence for staff of the Compliance and Enforcement Division should continue to be sent to 1001 I Street, P.O. Box 4025, Sacramento, CA 95812. Correspondence specifically for the attention of the Director of CalRecycle should be sent to the address in the letterhead.

Enclosure: Application for Solid Waste Facility Permit/Waste Discharge Requirements

cc via e-mail:

Thea Tryon, Central Coast Regional Water Quality Control Board
ttryon@waterboards.ca.gov

Doug Monn, Director, City of Paso Robles Public Works Department
dmonn@prcity.com

Christine Karl, CalRecycle, Permitting
Christine.karl@calrecycle.ca.gov